

EXHIBIT C

RFPs to TPPs

Wholesaler Defendants hereby seek, pursuant to Rule 34, the following documents from class representative MADA and MSP, and from each Assignor of TPP claims to MSP, Summacare, Connecticare, and Emblem Health (collectively "Assignors," individually "Assignor").

Identification and Detail Regarding Claims Data Involving Wholesalers

1. To the extent you have previously produced transactional data for each and every claim for which you seek any damages and/or equitable or legal relief from Wholesaler Defendants in this MDL litigation (collectively, the "Claims," individually, a "Claim"), identify on a Claim-by-Claim basis:
 - a. the Wholesaler Defendant(s) you allege sold the VCDs made the subject of that Claim;
 - b. whether it was a direct purchase by you from the Wholesaler Defendant(s);
 - c. whether you had any direct relationship with the Wholesaler Defendant(s) with regard to the Claim and/or the VCD made the subject of the Claim, and if so, the nature of that relationship;
 - d. the amount billed to you by the Wholesaler Defendant(s) with regard to the VCD made the subject of the Claim; and
 - e. the amount paid by you to the Wholesaler Defendant(s) with regard to the VCD made the subject of the Claim; and
 - f. the adjusted amount paid by you to the Wholesaler Defendant(s) with regard to the subject VCD made the subject of the Claim, including discounts, rebates, prescribing fees, PBM fees or other costs, allowances, or reimbursements.
2. To the extent you have not previously produced transactional data for the entirety of the Claims for which you seek relief from Wholesaler Defendant(s), the information sought in Request for Production No.1 for such Claims.
3. Any and all documents which refer to, relate to and/or reflect the information requested in RFP No. 1 above.
4. Any and all documents which refer to, relate to and/or reflect the information requested in RFP No. 2 above.

Additional Claims Data Detail Not Previously Produced

5. To the extent you have not previously produced the following transactional data for each of the Claims, on a Claim-by-Claim basis, the below information:
 - a. the date of the Claim;
 - b. a Claim identifier;
 - c. the carrier ID;

- d. the group ID;
 - e. the plan code;
 - f. the member/patient identifier;
 - g. the member/patient state;
 - h. the date of the purchase of the VCD made the subject of the Claim;
 - i. the corresponding NDC, batch and lot number of the VCD made the subject of the Claim;
 - j. the pharmacy name, city and state that dispensed the VCD made the subject of the Claim;
 - k. the quantity dispensed of that NDC made the subject of the Claim;
 - l. the ingredient cost with regard to the subject VCD made the subject of the Claim;
 - m. the dispensing fee with regard to the subject VCD made the subject of the Claim;
 - n. the amount paid by the member/patient/consumer with regard to the subject VCD made the subject of the Claim;
 - o. the amount billed to you by any non-Wholesaler Defendant entity with regard to the subject VCD made the subject of the Claim;
 - p. the amount paid by you to any non-Wholesaler Defendant entity with regard to the subject VCD made the subject of the Claim;
 - q. the adjusted amount paid by you to any non-Wholesaler Defendant entity with regard to the subject VCD made the subject of the Claim, including discounts, rebates, prescribing fees, PBM fees or other costs, allowances, or reimbursements;
 - r. a notation where the Claim involved a purchase of a VCD by a Pharmacy Retailer from a Wholesaler Defendant, and the identity of such Wholesaler Defendant;
 - s. a notation where the Claim involved a direct purchase of a VCD by a Pharmacy Retailer from the VCD Manufacturer, with no involvement of a Wholesaler Defendant, and the identity of the VCD Manufacturer;
 - t. a notation where the Claim involved a purchase of a VCD by a Pharmacy Retailer from a non-defendant wholesaler or distributor, with no involvement of a Wholesaler Defendant, and the identity of the non-defendant wholesaler or distributor.
6. Any and all supporting contemporaneous records from each Assignor(s) that support each Claim.

Communications and Contracts with Wholesaler Defendants

7. Any and all documents which refer to, relate to and/or reflect any contracts and/or agreements between you and any Wholesaler Defendant.
8. Any and all documents which refer to, relate to and/or reflect communications between you and any Wholesaler Defendant regarding any Claim, individually, or the Claims, collectively.
9. Any and all documents which refer to, relate to and/or reflect any and all communications between you and any Wholesaler Defendant regarding the VCDs made the subject of the Claims.

Assignments to MSP from Assignors

10. For each Claim that you obtained through an assignment, any and all communications between you and the party making the assignment reflecting the negotiation of the assignment.

Elements of Unjust Enrichment Cause of Action

11. Any and all documents which refer to, relate to and/or reflect the specific benefit you allege each Wholesaler Defendant(s) received with regard to each Claim, the value of such benefit, whether you conferred such benefit, and if not, the party who did confer such benefit.
12. For each Claim identified in RFP No. 11 above, any and all documents which refer to, relate to and/or reflect the portion of each specific benefit that you allege it would be unjust for the relevant Wholesaler Defendant(s) to retain, and/or to the reason such retention would be unjust.
13. Any and all documents which refer to, relate to and/or reflect any action by a Wholesaler Defendant that misled you with regard to a Claim, and/or with regard to a VCD made the subject of a Claim, and the specific Claim involved.
14. Any and all documents which refer to, relate to and/or reflect each Claim for which you expected remuneration from a Wholesaler Defendant(s), the time at which you first expected such remuneration, the type and amount of such expected remuneration, and any failure of such remuneration.
15. Any and all documents which refer to, relate to and/or reflect each Claim for which you allege a Wholesaler Defendant engaged in any wrongdoing and/or unjust or improper conduct with regard to the VCDs made the subject of the Claims and the details of such wrongdoing and/or unjust or improper conduct.
16. Any and all documents which refer to, relate to and/or reflect any action of a Wholesaler Defendant that directly or indirectly caused damage to you with regard to any specific Claim.

Damages to TPPs

17. Any and all documents which refer to, relate to and/or reflect the type of damages you seek with regard to each Claim.
18. Any and all documents which refer to, relate to and/or reflect the amount of damages you seek with regard to each Claim.
19. Any and all documents which refer to, relate to and/or reflect the Wholesaler Defendant from whom you seek the damages referenced in RFP Nos. 17 and 18 for each Claim.
20. Any and all documents which refer to, relate to and/or reflect the methodology used to calculate the amount of damages referenced in No. 18 you seek with regard to each Claim.
21. Any and all documents which refer to, relate to and/or reflect each Claim for which you incurred a direct expense that you would not have incurred regardless of the blood pressure prescription covered by you for your insured and/or member.

Value and Safety of VCDs to TPPs and Insureds/Consumers

22. For each Claim, any and all documents which refer to, relate to and/or reflect the value provided to your insured and/or member by the covered VCD prescription and the amount of the value provided.
23. For each Claim, any and all documents which refer to, relate to and/or reflect the value provided to you by the covered VCD prescription and the amount of value provided.
24. For each Claim, any and all documents which refer to, relate to and/or reflect that a particular covered VCD prescription did not provide full value to your insured and/or member taking the specific VCD prescription, and the amount of value not provided.
25. For each Claim, any and all documents which refer to, relate to and/or reflect that a particular covered VCD prescription did not provide full value to you through fulfillment of your contractual obligations to your insureds and/or members and the amount of value not provided.
26. Any and all documents referring or relating to the safety of VCDs, the efficacy of VCDs, or discussions or determinations whether and how VCDs should be included on the formulary.
27. The underlying medical records in your possession, custody and/or control regarding the VCDs prescribed and/or their therapeutic effect for each patient who is a subject of the Claims.

Unclean Hands: Profits of TPPs from Covering the VCDs In Issue

28. Documents sufficient to determine the gross revenue, expenses and/or costs, and net profits to you on each Claim and the documents upon which you base your calculations of same.